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VILLAGE OF SAUGET PHYSICAL-CHEMICAL
WASTEWATER TREATMENT PLANT
ENVIRONMENTAL AUDIT

November 6, 1984

WASTEWATER TREATMENT PLANT

ENVIRONMENTAL AUDIT

INTRODUCTION

An environmental audit was performed on the Village of Sauget Physical-Chemical Wastewater Treatment Plant on November 6, 1984, per the Association Board's request. The purpose of the audit was to examine the Treatment Plant's operation, permits, records and reports to ascertain compliance with federal and state environmental laws and regulations. The audit team consisted of Steve Smith, Monsanto and Association Treasurer, Sandy Silverstein, Cerro Copper, and John DeSelm, AMAX Zinc.

COMPLIANCE WITH "SOLID WASTE" REGULATIONS

Pertaining to Hazardous Waste:

The audit team concurs with B. Hanke's May 18, 1984, Memorandum's determination that the Treatment Plant is not a generator, treater, storer or disposer of hazardous waste according to regulation. In addition, analyses of wastes generated at the Treatment Plant show that the wastes are not hazardous according to 40 CFR 261 Subpart C and comparable Illinois statutes. As such, no regulations pertaining to hazardous waste apply to Treatment Plant operations. However, it is a recommendation of the audit team that annual testing be performed in accordance with 40 CFR 261 Subpart C for all wastes generated due to possibly changing influent constituents and concentrations. This will ensure that the Treatment Plant position, as it relates to the hazardous waste regulations, does not change.

Pertaining to Illinois Special Waste:

The permit and manifest regulations as enforced by the Illinois EPA are being met. Presently, the Treatment Plant need not comply with State manifest requirements. This is based on the letter and policy statement obtained from Illinois EPA by C. Marciante on October 20, 1983. However, manifesting the transportation and disposal of collected oil from the Treatment Plant oil skimmings operation to a facility in Louisiana is required by the State of Louisiana. Compliance is now being met. It is a recommendation of the audit team that continued manifesting of this oil occur, whether or not it is required by regulation. In addition, it is recommended that investigation of TWI, Inc.

or other nearby sites as the disposal site for the oil continue in order to eliminate potential problems associated with long distance transportation.

The audit team also recommends a minimum of annual inspections of all disposal facilities and transporter's equipment handling Treatment Plant wastes by Treatment Plant personnel or one of the member industries. This should be done to minimize the liability associated with improper waste handling. In addition, continued use of reputable waste firms is a must. Low bidders for waste contracts must be investigated thoroughly.

The audit team also recommends continued investigation into the disposal of the Treatment Plant wastes at a joint Sauget/Regional disposal facility due to the Milam Landfill's poor standing with the Illinois EPA and the landfill's short life expectancy.

In addition, it is recommended that an investigation be performed to evaluate the need for a disposal procedure for laboratory wastes. Whether or not a procedure is needed would be based on types and quantities of waste generated, if any, from the laboratory.

Pertaining to Solid Wastes:

The audit team finds no significant concern relating to the disposal of trash and "clean" debris. Present handling and disposal practices are sufficient.

COMPLIANCE WITH GROUNDWATER REGULATIONS

Presently the area of groundwater protection regulations are in a state of flux. General non-specific regulations exist and more detailed approaches are presently being developed by state and federal agencies. The audit team understands that there is an ongoing groundwater program at the Treatment Plant. The audit team concurs with this course of action.

COMPLIANCE WITH AIR REGULATIONS

Atmospheric discharges for the Treatment Plant are minimal. Recently the only emission point source (lime silo) was permitted. The audit team recommends the Treatment Plant begin maintaining formal maintenance records of the lime

silo baghouse in accordance with the permit's special condition Number 7.

COMPLIANCE WITH WATER REGULATIONS

Pertaining to the NPDES Permit:

The Treatment Plant is presently operating under a stipulated agreement with the Illinois EPA covering acceptable modifications to the expired 1979 NPDES permit. Issuance of a new, formal NPDES permit is pending action by the Illinois EPA. The audit team has no recommendations pertaining to the permit or its non-compliance reporting requirements.

Pertaining to the SPCC Plan:

The Spill Prevention Control and Countermeasure Plan for the Treatment Plant was reviewed and found to be in compliance with the 40 CFR 112.7 requirements. Plan-required weekly inspections are being made and logged.

Pertaining to the Pretreatment Requirements:

Approval authority for the Treatment Plant to begin a pretreatment program has been requested. Authority is pending action by the Illinois EPA and U. S. EPA. The Village Pretreatment Ordinance had previously been reviewed by all industries and found to be acceptable according to 40 CFR 403.8 at that time. It was not reviewed by this audit team.

COMPLIANCE WITH GOOD LAB PRACTICES

The Treatment Plant staff has developed a comprehensive manual of EPA-acceptable analytical methods for all parameters that the Treatment Plant is required to analyze. No recommendations are made.

COMPLIANCE WITH OTHER REGULATIONS

Asbestos regulations per 40 CFR 61.20 were reviewed as they relate to the Treatment Plant. It is unknown to what extent asbestos had been used in Treatment Plant construction. The Treatment Plant staff are aware of the regulatory requirements for asbestos. If any asbestos work is done, 40 CFR 61.20 needs to be followed.

There is no concern for PCB's as outlined by 40 CFR 761 as there are no PCB's at the Treatment Plant.

CONCLUSION

The audit team finds the Treatment Plant in substantial compliance with environmental laws and regulations.

VILLAGE OF SAUGET
SANITARY DEVELOPMENT AND RESEARCH ASSOCIATION
10 MOBILE STREET
SAUGET, ILLINOIS 62201

August 31, 1984

Sam McWilliams
George Clark
Paul Tandler
Robert Reinhardt

Dear Sirs:

It has been recommended that an environmental audit be conducted at the Sauget Wastewater Treatment Plant. The following framework is recommended:

Purpose: To verify compliance with all applicable EPA regulations.

Who: The audit team would include one representative from each of your plants who is familiar with environmental regulations. A team chairman should be determined.

Where: Sauget Waste Treatment Plant.

When: The audit should require no more than one day during ~~October~~ **Nov.**, 1984.

Results: The audit team chairman will give a brief report on the results of the audit to the Association Board at the following regularly scheduled meeting.

I will schedule this topic for discussion at the ~~September~~ **OCTOBER** Board meeting.

Very truly yours,

Steve Smith
Steven D. Smith

SDS/ba

cc: J. Molloy
W. Smull
H. Baker
C. Marciante
B. Hanke

Jim Jones
John DeForn
James Sullivan
Steve Smith
WTP

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